

STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION

Docket No.: 2021-349-E

<p>Joint Petition of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC to Request the Commission to Hold a Joint Hearing with the North Carolina Utilities Commission to Develop Carbon Plan</p>	<p><b>PETITION TO INTERVENE ON BEHALF OF VOTE SOLAR</b></p>
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Petitioner Vote Solar, pursuant to S.C. CODE ANN. REGS. § 103-825, requests the Public Service Commission of South Carolina (“Commission”) permit it to intervene in the instant proceeding and, in support thereof, states the following.

1. Vote Solar is a non-profit, grassroots organization that works to foster economic opportunity, promote energy independence for consumers, and address environmental concerns by making solar generation accessible and cost-effective for all Americans. Vote Solar works to bring solar into the mainstream by engaging at the local, state, and federal levels to help remove regulatory barriers and implement policies and programs to bring solar to scale. Vote Solar was established in 2002 and has over 110,000 members, nationally, and more than 2,000 in South Carolina, many of which take electrical service from and are located within the service territories of Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP,” and together with DEC, “Duke Energy”).

2. Vote Solar is not an industry group and does not have members representing the solar trade.

3. In state regulatory proceedings, Vote Solar focuses on rate design and public policy issues related to consumer use of and access to solar generation. Recognizing the importance of programs and regulatory constructs for supporting customer-sited and other

forms of solar, Vote Solar has actively participated in utility commission proceedings across the country involving net metering, interconnection, rate design, and resource procurement, including Arizona, California, Colorado, Florida, Georgia, Idaho, Louisiana, Massachusetts, Minnesota, Nevada, New Mexico, New York, North Carolina, South Carolina, Utah, Vermont, and Wisconsin. In each of these cases, Vote Solar effectively advocated against the unreasonable imposition of barriers or rate changes that would negatively impact consumers' ability to utilize solar generation to effectively manage electricity costs.

4. Vote Solar has a substantial interest in the subject matter of the instant proceeding. Vote Solar is an intervenor in Commission dockets 2019-224[/225]-E, which continue to establish Duke Energy's integrated resource plans ("IRP") under the Energy Freedom Act ("A62"). The instant docket is directly related to and will, likely, bear a direct impact on Vote Solar's positions in Duke Energy's IRP proceedings.

5. Vote Solar has been an intervenor and/or participated in at least a dozen other Commission dockets, including: 2021-143[/144]-E [Duke Energy's Smart Saver program], 2020-264[/265]-E [Duke Energy's Solar Choice tariff], and 2020-229-E [Dominion Energy South Carolina, Inc.'s Solar Choice tariff].

6. Vote Solar worked with stakeholders throughout the development of A62 on net metering issues and has a direct interest in fulfilling the implementation of these provisions.

7. The name and principal business address of the petitioner herein is Vote Solar, 360 22nd Street, Suite 730, Oakland, California 94612.

8. Vote Solar consents to service via electronic mail and requests that all communications regarding the instant docket be directed to Vote Solar's counsel of record.

9. Pursuant to S.C. CODE ANN. REGS. § 103-804(T), Vote Solar is represented by the following counsel in the instant proceeding:

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10. If intervention is granted, Vote Solar will request the Commission consider and, potentially, offer evidence on ratepayer impacts of Duke Energy's carbon plan and the efficacy of Duke Energy's carbon plan for decarbonizing South Carolina's electrical systems, among other issues.

11. In sum, Vote Solar expects to meaningfully contribute to the development of the record in this proceeding and to provide evidence consistent with the requirements of the law.

12. On these and other grounds, Vote Solar requests the Commission permit it to intervene.

13. On information and belief, no other party will adequately represent Vote Solar's unique interest.

WHEREFORE Vote Solar respectfully requests the Commission enter an order permitting it to intervene as a party of record and participate fully in the instant proceeding.

Respectfully submitted,

December 29, 2021

Greenville, South Carolina

TPGL 11662800v1

TURNER PADGET GRAHAM & LANEY, P.A.

By:

/s/ R. Taylor Speer

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*Attorneys for Vote Solar*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY on December 29, 2021 the undersigned filed the foregoing petition with the Commission's DMS and further served a copy upon the recipients on the attached service list by electronic mail.

By: /s/ R. Taylor Speer  
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